



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Applicant(s): Michael J. Wookey, Trevor Watson, Jean Chouanard

Assignee: Sun Microsystems, Inc.

Title: Remote Services System Data Delivery Mechanism

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Examiner: Michael A. Delgado Group Art Unit: 2144

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**PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS**

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1 - 18 stand rejected under Chiang et al., U.S. Publication No. 20040221292 (Chiang). This rejection is respectfully traversed.

REMARKS

The following remarks provide applicants' position regarding how the claims distinguish over the art of record. While not discussed herein, all the arguments presented regarding hindsight reconstruction and suggestion to combine are maintained.

The present invention generally relates to a data delivery mechanism which allows a remote services infrastructure back-channel to be independent of a network layer. The data

delivery mechanism allows back-channel communication without the need for network parameters. In the remote service infrastructure, back-channel communication is based upon an internally allocated remote services ID where communication is always established in a forward direction.

When discussing the remote services architecture, the Wookey application sets forth:

The architecture is broadly comprised of the remote service infrastructure 102, a group of service modules 103 and a plurality of communications modules 110. The remote services infrastructure 102 provides reliable remote service delivery and data management. The remote services infrastructure 102 supports the needs of a service creator by focusing the service creator on the needs and the design of the service by eliminating the need for the service creator to be concerned about how data is transferred and managed to and from a customer site.

The remote services infrastructure 102 provides an interface to support the development of services that use a set of common service parameters to develop customized services for a specific service provider or customer. The infrastructure 102 is separately segmented from, but actively interacts with, the service modules 103. (Wookey application, Page 6, lines 8 – 18.)

When discussing forward channel and back-channel communication, the Wookey application sets forth:

The DTDs [i.e., document type definitions] for the XML messages are for both forward and back-channel messages. The primary distinction is that the forward channel messages contain a source element which details where the message originated (in the remote services system 100) and some quality of services (QoS) parameters. The Back-channel message, however, contains the destination element which defines how the message is routed through the remote services system. (Wookey Application, Page 30, lines 4 – 9, definition of DTD carried forward from elsewhere in application.)

More specifically, the present invention, as set forth by independent claim 1, relates to a method of communicating in a remote services system which includes assigning a component within the remote services system with a unique remote services identifier, communicating a forward channel communication using a forward channel communication path, communicating a back-channel communication using a back-channel communication path, and determining a destination of the back-channel communication based upon the unique remote services identifier of the component.

The present invention, as set forth by independent claim 7, relates to a method of communicating in a remote services system which includes communicating a forward channel communication using a forward channel communication path, and communicating a back-channel communication using a back-channel communication path, the back-channel communication path being established only after a forward channel communication path is established.

The present invention, as set forth by independent claim 13, relates to a method of communicating in a remote services system which includes assigning a component within the remote services system with a unique remote services identifier, communicating a forward channel communication using a forward channel communication path, communicating a back-channel communication using a back-channel communication path, the back-channel communication path being established only after a forward channel communication path is established, and determining a destination of the back-channel communication based upon the unique remote services identifier of the component.

Chiang relates to exchanging information between applications and more specifically to integrating dissimilar applications where one application executes on one platform and another application executes on another platform. The system enables the dissimilar applications to establish a dialog with one to establish connectivity for transferring the information between the applications.

More specifically, in the system, a dialog is established by initiating the application request on an end user application in a first language (such as a markup language) with a first application program (such as a Web browser), and transmitting the application request to a server and converting the application from the first language of the first end user application to a language running on the application server, processing the application request on the application server, and transmitting the response from the application server back to the end user application, and converting the response from the language running on the application server to the language of the end user application.

The examiners cites to various parts of paragraph 28 of Chiang to support the contention that Chiang anticipates the present claims. Paragraph 28 of Chiang sets forth:

In a preferred embodiment of the invention, the metamodel is used in an transaction message management environment for processing an application request on an end user application and an application server where the server a transaction message formatter. In this embodiment an application request is initiated on the end user application in a first language with a first application program, and transmitted to the server where it is converted from the first language of the first end user application to a form for the transaction message formatter running on the application server. The application request is processed on the application server and a response is transmitted from the application server to the end user application. The response to the application request is converted from the language and form of transaction message formatter running on the application server to the first language of the first end user application. The end user application and the application server have at least one connector therebetween. In this way steps of (i) converting the application request from the first language of the first end user application as a source language to the language (including the form of the transaction message message formatter) running on the application server as a target language, and (ii) converting a response to the application request from the language (including the form of the transaction message message formatter) running on the application server as a source language to the first language of the first end user application as a target language, each comprise the steps of: invoking connector metamodels of respective source language and target transaction message formatter; populating the connector metamodels with metamodel data of each of the respective source language and target transaction message formatter, the metamodel data of the target transaction message formatter including a message descriptor, logical page, password, segment, message field, device descriptor, device type, device division, device page and device field; and converting the source language to the transaction message formatter. To be noted is that the metamodel data of the target transaction message formatter includes a message descriptor, logical page, password, segment, message field, device descriptor, device type, device division, device page and device field. (Chiang, Para. 28.)

However, nowhere within this paragraph, and in fact no where in Chiang, is there any teaching of a remote services system, much less such a remote services system which includes forward channel communication and back-channel communication as claimed. Accordingly, the examiner has not established anticipation of the claimed invention nor a prima facie case of obviousness of the claimed invention. (See MPEP § 2131 and 2142.

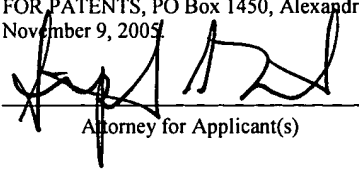
More specifically, Chiang does not teach or suggest a method of communicating in a remote services system which includes assigning a component within the remote services system with a unique remote services identifier, communicating a forward channel communication using a forward channel communication path, communicating a back-channel communication using a back-channel communication path, and determining a destination of the back-channel communication based upon the unique remote services identifier of the component, all as

required by claim 1. Accordingly, claim 1 is allowable over Chiang. Claims 2 - 6 depend from claim 1 and are allowable for at least this reason.

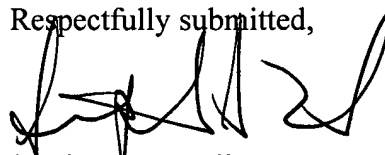
Chiang does not teach or suggest a method of communicating in a remote services system which includes communicating a forward channel communication using a forward channel communication path, and communicating a back-channel communication using a back-channel communication path, the back-channel communication path being established only after a forward channel communication path is established, all as required by claim 7. Accordingly, claim 7 is allowable over Chiang. Claims 8 - 12 depend from claim 7 and are allowable for at least this reason.

Chiang does not teach or suggest a method of communicating in a remote services system which includes assigning a component within the remote services system with a unique remote services identifier, communicating a forward channel communication using a forward channel communication path, communicating a back-channel communication using a back-channel communication path, the back-channel communication path being established only after a forward channel communication path is established, and determining a destination of the back-channel communication based upon the unique remote services identifier of the component, all as required by claim 13. Accordingly, claim 13 is allowable over Chiang. Claims 14 - 18 depend from claim 13 and are allowable for at least this reason.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned.

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	11/9/05
Attorney for Applicant(s)	Date of Signature

Respectfully submitted,


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